



Department of Energy

**Ohio Field Office
Fernald Closure Project
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OCT 14 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0014-05

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**RESPONSE TO COMMENTS FOR THE OPERABLE UNIT 4 COMPLEX SILO 3
IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND
DISMANTLEMENT**

Reference: Letter, T. A. Schneider to W. J. Taylor, " Re: Comments: Operable
Unit 3 Operable Unit 4 (OU4) Complex Silo 3 Implementation Plan
For Above-Grade Decontamination and Dismantlement" dated
September 14, 2004

In response to the referenced letter, the regulatory agencies comments relating to
the Operable Unit 4 (OU4) Complex Silo 3 Implementation Plan for Above-Grade
Decontamination and Dismantlement (D&D) have been addressed.

This letter transmits the response to comments along with the OU4 Complex Silo
Implementation Plan for Above-Grade D&D Page Change Notice 1 (PCN1).

Please remove the existing implementation plan pages affected by this change and
replace them with the enclosure.

Mr. Saric
Mr. Schneider

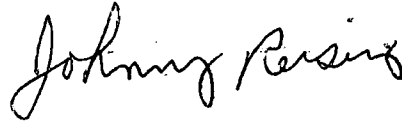
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If there are any questions concerning this information, please contact Ed Skintik at (513) 246-1369.

Sincerely,



William J. Taylor
Director

Enclosure: As Stated

w/enclosures:

J. Neyer, OH/FCP
J. Sattler, OH/FCP
E. Skintik, DOE/OH
G. Jablonowski, USEPA-V, SR-6J
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HIS GeoTrans
R. Vandergrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

w/o enclosures:

K. Johnson, OH/FCP
B. Edmondson, Fluor Fernald, Inc./MS64
J. Fry, Fluor Fernald, Inc./MS64
D. Nixon, Fluor Fernald, Inc./MS01
M. Jewett, Fluor Fernald, Inc./MS52-5
C. Murphy, Fluor Fernald, Inc./MS01
T. Poff, Fluor Fernald Inc./MS65-2
D. Powell, Fluor Fernald Inc./MS64
D. Sizemore, Fluor Fernald, Inc./MS02
C. West, Fluor Fernald Inc./MS52-0
ECDC Fluor Fernald Inc./MS52-7 Project Number 15000.2.1
Administrative Record Fluor Fernald Inc./MS78

**OPERABLE UNIT FOUR IMPLEMENTATION PLAN
FERNALD CLOSURE PROJECT RESOLUTION TO OHIO EPA COMMENTS**

Comment: General – Because this document is being submitted before operation of Silo 3 remediation project, DOE should revisit and, if necessary, resubmit this document after initiation of operation when a more complete picture of the decontamination and dismantlement issues are available.

Response: If decontamination and dismantlement issues that would require modification are cited, a revision or page change notice will be made to the implementation plan and forwarded to the regulatory agencies for approval.

Comment: Section 2.2, Page 4 – The text states that radiological characterization information for Silo 3 and associated structures will not presented in this plan. Ohio EPA feels this is important information to review. Please include in what document this will be available.

Response: Section 2.2, Paragraph 1 – The last sentence has been changed to read: "Upon availability, the radiological characterization information for Silo 3 and associated structures will be issued with a submittal letter to the regulatory agencies."

Silo 3 and the associated structures will meet the requirements of Engineering Specifications 01517 and 01519 (included in Appendix C of the Implementation Plan) before they are opened to the environment.

Comment: Section 2.3.4, Page 8 – In Table 2-1 and numerous other portions of this document, reference is made to disposing Silo 3 materials that meet the WAC in the OSDF. Depending on when actual operations and then D&D of the Silos takes place, the OSDF may no longer be open to receive waste. As this is a known possibility, please include contingency plans for the waste if the OSDF is no longer open.

Response: The following text has been added as the last paragraph to Section 2.3.4: "If debris cannot be dispositioned in the OSDF, either because the OSDF is not open or the debris does not meet the OSDF WAC, the preferred disposition is Envirocare via the WPRAP rail system. If this option is not available, another offsite disposal facility (TBD) will be used."

Comment: Section 2.3.4, Page 9 – This paragraph states that for stockpiling debris, the strategies provided under Section 3.3.2.3 of the OU3 Integrated RD/RA Work Plan would be followed. While some generic strategies are defined, this section of the RD/RA Work Plan also states that "project-specific storage/staging determinations will be made during design." As this Implementation Plan is the design for Silo 3 D&D, please provide these details on stockpiling debris.

Response: Section 2.3.4, Paragraph 3 - The following two sentences have been added to the end of this paragraph: "At this time, there are no plans to stockpile Silo 3 debris. In the event stockpiling becomes necessary, all site requirements will be met."

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**OPERABLE UNIT FOUR IMPLEMENTATION PLAN
FERNALD CLOSURE PROJECT RESOLUTION TO OHIO EPA COMMENTS**

Comment: Section 2.4, Page 11 – The document states that supplemental radiological air monitoring will not be required. This is unacceptable to Ohio EPA, especially considering the facility has not started operation with actual silo material. DOE shall implement a supplemental radiological air-monitoring program that includes both the operation of the remediation project as well as demolition and decontamination of the facility.

Response: Section 2.4, Subtitle "Radiological Air Monitoring", Page 11 – The last paragraph has been changed to read: "The supplemental radiological air monitoring program implemented in preparation for operation of the Silo 3 Remediation facility (as outlined in the Silo 3 Remedial Design Package) will be maintained during the Silo 3 and associated structures D&D activities." Note: As a result of this change, reference to several documents has been removed from Page 29.

Comment: Section 2.6, Page 17-18 – This section discusses the use of new and/or innovative technologies, and says they will be identified in the work control documents. Since the regulatory agencies do not see these work control documents, please explain how the agencies will be kept updated on all new technologies DOE wishes to use on this project.

Response: The following text has been added as the last sentence to Section 2.6:
"Information relating to any new or innovative technologies incorporated during the decontamination and demolition activities will be issued with a submittal letter to the regulatory agencies."

Comment: Section 3.2, Page 22 – The text describes surface decontamination will be performed but does not mention how residual material will be removed or reduced from inside tanks, lines and other pieces of equipment. Please clarify.

Response: Section 3.2, Subtitle "Surface Decontamination", Page 22 – The following text has been added as the last two sentences: "At the completion of the operations phase, the project will retrieve surrogate material such as flyash or sand to flush out the system. This waste stream will be packaged for disposal."

Comment: Appendix A, Page 2 – Appendix A describes debris sampling for both NTS and a permitted off-site commercial disposal facility. Care should be taken when sampling to consider all possible disposal facility WAC's, not only disposal facilities normally used by the site in the past.

Response: Comment noted. No modification to the document is required.

Comment: Appendix B, Page 2 – The text on this page mentions 4 recycling alternatives, but only 3 are presented in Table B-1. Please provide details on the fourth alternative.

Response: The text inadvertently stated four leading alternatives to on-site disposal were compared (rather than three). The last sentence of the first paragraph in Appendix B has been changed to identify "three" leading alternatives to on-site disposal.

**OPERABLE UNIT FOUR COMPLEX SILO 3
IMPLEMENTATION PLAN**

DOCUMENT NUMBER 40900-PL-0001 (REV. 0) PCN1

PAGE CHANGES

INCLUDES:

COVER PAGE/RECORD OF REVISION

PAGE 3/4

PAGE 9/10

PAGE 11/12

PAGE 17/18

PAGE 21/22

PAGE 23/24

PAGE 25/26

PAGE 29/APPENDIX A, PAGE 1

APPENDIX A, PAGE 2/APPENDIX B, PAGE 1